SMNSR-U0-001875-2016.001

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Chipeta Processing LLC P.O. Box 173779, Denver, Colorado 80217-3779 720-929-6000 Fax 720-929-7000

November 4, 2016

SENT VIA CERTIFIED MAIL No.:

2014 STSO 0003 P377 0P54

Ms. Claudia Smith U.S. EPA, Region 8 1595 Wynkoop Street, 8P-AR Denver, CO 80202-1129

RE: Synthetic Minor NSR Permit Application under Part 49

Sage Grouse Compressor Station

Dear Ms. Smith:

Anadarko Uintah Midstream, LLC (Anadarko) is submitting the attached permit application under Part 49 Minor NSR rules for the Sage Grouse Compressor Station located in Uintah County, Utah. Anadarko is submitting this minor source application to establish federally enforceable limits as required by the Civil Action No. 07–CV–01034–EWN–KMT (KMG Consent Decree).

The attached application contains the following:

Appendix A: EPA Form New

Appendix B: EPA Form SYNMIN

Appendix C: Process Description, Flow Diagram, and Plot Plan Appendix D: Emission Unit and Emission Control Descriptions

Appendix E: Emission Summary

Appendix F: Detailed Emission Calculations

Appendix G: Regulatory Analysis

Sincerely,

Anadarko Uintah Midstream, LLC

Natalie Ohlhausen Sr. HSE Representative

Enclosures

Appendix A

Form NEW

(Application for New Construction)



United States Environmental Protection Agency Program Address Phone Fax Web address

Reviewing Authority Program Address Phone Fax Web address

FEDERAL MINOR NEW SOURCE REVIEW PROGRAM IN INDIAN COUNTRY

Application for New Construction (Form NEW)
Please check all that apply to show how you are using this form:
☐ Proposed Construction of a New Source
☐ Proposed Construction of New Equipment at an Existing Source
☐ Proposed Modification of an Existing Source
☑ Other – Please Explain
Existing Source operating under synthetic minor limits, as regulated
under Consent Decree, submitting an application for a synthetic minor
permit under Part 49.

Please submit information to:

Ms. Claudia Smith U.S. EPA Region 8 1595 Wynkoop Street, 8P-AR Denver, CO 80202-1129

A. GENERAL SOURCE INFORMATION

1. (a) Company Name		2. Source Name			
Anadarko Uintah	Midstream LLC	Sage Grouse Compr	essor Station		
(b) Operator Name					
Anadarko Uintah	Midstream LLC				
3. Type of Operation		4. Portable Source?	Yes ⊠ No		
Nat.Gas Compression	& Transmission	5. Temporary Source?	Yes ⊠ No		
6. NAICS Code		7. SIC Code			
		1311			
8. Physical Address (home base	for portable sources)				
9. Reservation*	10. County*	11a. Latitude*	11b. Longitude*		
Uintah and Ouray	Uintah	39.90377° N	~109.47078 ° W		
12a. Quarter Quarter Section*	12b. Section*	12c. Township*	12d. Range*		
NW SW	32	10S	22E		

^{*}Provide all proposed locations of operation for portable sources

been issued to this source. Provide as an attachment if additional space is necessary)
Source Name on the Permit
Permit Number (xx-xxx-xxxx-xxxxxxx)
Date of the Permit Action
Bate of the Fernit Action
Source Name on the Permit
Source Name on the Fernit
Permit Number (xx-xxx-xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx
Date of the Permit Action
Source Name on the Permit
Permit Number (xx-xxx-xxxxx-xxxx.xx)
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Date of the Permit Action
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Source Name on the Permit
Source I talline on the I contact
Permit Number (xx-xxx-xxxxx-xxxxxxxxxxxxxxxxxxxxxxxx
Date of the Permit Action
Source Name on the Permit
Permit Number (xx-xxx-xxxxx-xxxx.xx)
Date of the Permit Action

C. CONTACT INFORMATION

Company Contact Mike Weaver	Title Midstream Operations Manager
Mailing Address P.O.Box 173779, Denver, CO 80202-3	779
Email Address Mike.Weaver@anadarko.com	
Telephone Number	Facsimile Number
720-929-6792	
Operator Contact (if different from company contact)	Title
Andy Zeller	Plant Foreman
Mailing Address	
Email Address	
andy.zeller@anadarko.com	
Telephone Number	Facsimile Number
435-781-7001	
Source Contact	Title
Natalie Ohlhausen	Sr. HSE Representative
Mailing Address	
P.O.Box 173779, Denver, CO 80202-3	779
Email Address	
Natalie.Ohlhausen@Anadarko.com	
Telephone Number	Facsimile Number
720-929-6498	
Compliance Contact	Title
Same as Source Contact	
Mailing Address	
Email Address	
Telephone Number	Facsimile Number

D. ATTACHMENTS

<u>Include all of the following information</u> (see the attached instructions)

M FORM SYNMIN - New Source Review Synthetic Minor Limit Request Form, if synthetic minor limits are being requested.
△ Narrative description of the proposed production processes. This description should follow the flow of the process flow diagram to be submitted with this application.
☑ Process flow chart identifying all proposed processing, combustion, handling, storage, and emission control equipment.
☑ A list and descriptions of all proposed emission units and air pollution-generating activities.
□ Type and quantity of fuels, including sulfur content of fuels, proposed to be used on a daily, annual and maximum hourly basis.
☑ Type and quantity of raw materials used or final product produced proposed to be used on a daily, annual and maximum hourly basis.
\boxtimes Proposed operating schedule, including number of hours per day, number of days per week and number of weeks per year.
☐ A list and description of all proposed emission controls, control efficiencies, emission limits, and monitoring for each emission unit and air pollution generating activity.
\boxtimes Criteria Pollutant Emissions - Estimates of Current Actual Emissions, Current Allowable Emissions, Post-Change Uncontrolled Emissions, and Post-Change Allowable Emissions for the following air pollutants: particulate matter, PM ₁₀ , PM _{2.5} , sulfur oxides (SOx), nitrogen oxides (NOx), carbon monoxide (CO), volatile organic compound (VOC), lead (Pb) and lead compounds, fluorides (gaseous and particulate), sulfuric acid mist (H ₂ SO ₄), hydrogen sulfide (H ₂ S), total reduced sulfur (TRS) and reduced sulfur compounds, including all calculations for the estimates.
These estimates are to be made for each emission unit, emission generating activity, and the project/source in total.
☐ Modeling – Air Quality Impact Analysis (AQIA)
☐ ESA (Endangered Species Act)
□ NHPA (National Historic Preservation Act)

E. TABLE OF ESTIMATED EMISSIONS

The following tables provide the total emissions in tons/year for all pollutants from the calculations required in Section D of this form, as appropriate for the use specified at the top of the form.

E(i) – Proposed New Source

Pollutant	Potential Emissions (tpy)	Proposed Allowable Emissions (tpy)	
PM		0.0	PM - Particulate Matter PM ₁₀ - Particulate Matter less
PM ₁₀		0.0	than 10 microns in size
PM _{2.5}		0.0	PM _{2.5} - Particulate Matter less than 2.5 microns in size
SO _x			SOx - Sulfur Oxides NOx - Nitrogen Oxides
NO _x		84.4	CO - Carbon Monoxide
СО		24.9	VOC - Volatile Organic Compound
VOC		22.8	Pb - Lead and lead compounds Fluorides - Gaseous and
Pb			particulates
CO2e		23209.5	H ₂ SO ₄ - Sulfuric Acid Mist H ₂ S - Hydrogen Sulfide
Fluorides			TRS - Total Reduced Sulfur
H ₂ SO ₄			RSC - Reduced Sulfur Compounds
H ₂ S			
TRS			1
RSC			1

Emissions calculations must include fugitive emissions if the source is one the following listed sources, pursuant to CAA Section 302(j):

- (a) Coal cleaning plants (with thermal dryers);
- (b) Kraft pulp mills;
- (c) Portland cement plants;
- (d) Primary zinc smelters;
- (e) Iron and steel mills;
- (f) Primary aluminum ore reduction plants;
- (g) Primary copper smelters;
- (h) Municipal incinerators capable of charging more than 250 tons of refuse per day;
- (i) Hydrofluoric, sulfuric, or nitric acid plants;
- (j) Petroleum refineries;
- (k) Lime plants;
- (1) Phosphate rock processing plants;
- (m) Coke oven batteries;
- (n) Sulfur recovery plants;
- (o) Carbon black plants (furnace process);
- (p) Primary lead smelters;
- (q) Fuel conversion plants;

- (r) Sintering plants;
- (s) Secondary metal production plants;
- (t) Chemical process plants
- (u) Fossil-fuel boilers (or combination thereof) totaling more than 250 million British thermal units per hour heat input;
- (v) Petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels;
- (w) Taconite ore processing plants;
- (x) Glass fiber processing plants;
- (y) Charcoal production plants;
- (z) Fossil fuel-fired steam electric plants of more that 250 million British thermal units per hour heat input, and
- (aa) Any other stationary source category which, as of August 7, 1980, is being regulated under section 111 or 112 of the Act.

Appendix B

Form SYNMIN

(Application for Synthetic Minor Limit)



United States Environmental Protection Agency

Program Address Phone Fax Web address Reviewing Authority Program Address Phone Fax Web address

FEDERAL MINOR NEW SOURCE REVIEW PROGRAM IN INDIAN COUNTRY

Application For Synthetic Minor Limit

(Form SYNMIN)

Please submit information to:

Ms. Claudia Smith U.S. EPA Region 8 Air and Toxics Division 1595 Wynkoop Denver, CO 80202-1129

A. GENERAL INFORMATION

Company Name	Source Name
Anadarko Uintah Midstream LLC	Sage Grouse Compressor Station
Company Contact or Owner Name Mike Weaver	Title Midstream Operations Manager
Mailing Address P.O.Box 173779, Denver, CO 80202-37	79
Email Address Mike.Weaver@anadarko.com	
Telephone Number	Facsimile Number
720-929-6792	

B. ATTACHMENTS

assure compliance with the proposed limitation.

For each criteria air pollutant, hazardous air pollutant and for all emission units and air pollutantgenerating activities to be covered by a limitation, include the following:

\[
\textsize \text{Item 1} - \text{The proposed limitation and a description of its effect on current actual, allowable and the potential to emit.}

\[
\text{Item 2} - \text{The proposed testing, monitoring, recordkeeping, and reporting requirements to be used to demonstrate and}
\]

□ Item 3 - A description of estimated efficiency of air pollution control equipment under present or anticipated operating conditions, including documentation of the manufacturer specifications and guarantees.

☑ **Item 4** - Estimates of the Post-Change Allowable Emissions that would result from compliance with the proposed limitation, including all calculations for the estimates.

☑ Item 5 – Estimates of the potential emissions of Greenhouse Gas (GHG) pollutants:

Appendix C

Process Description, Process Flow Diagram, & Plot Plan

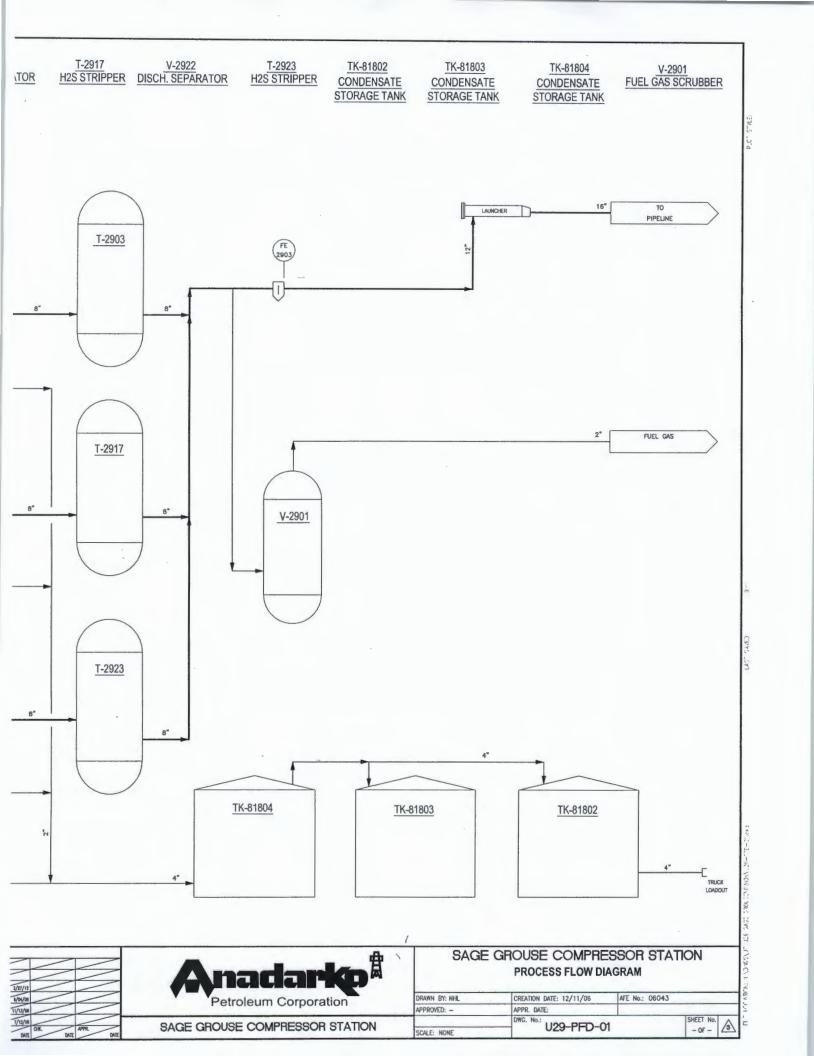
Process Description

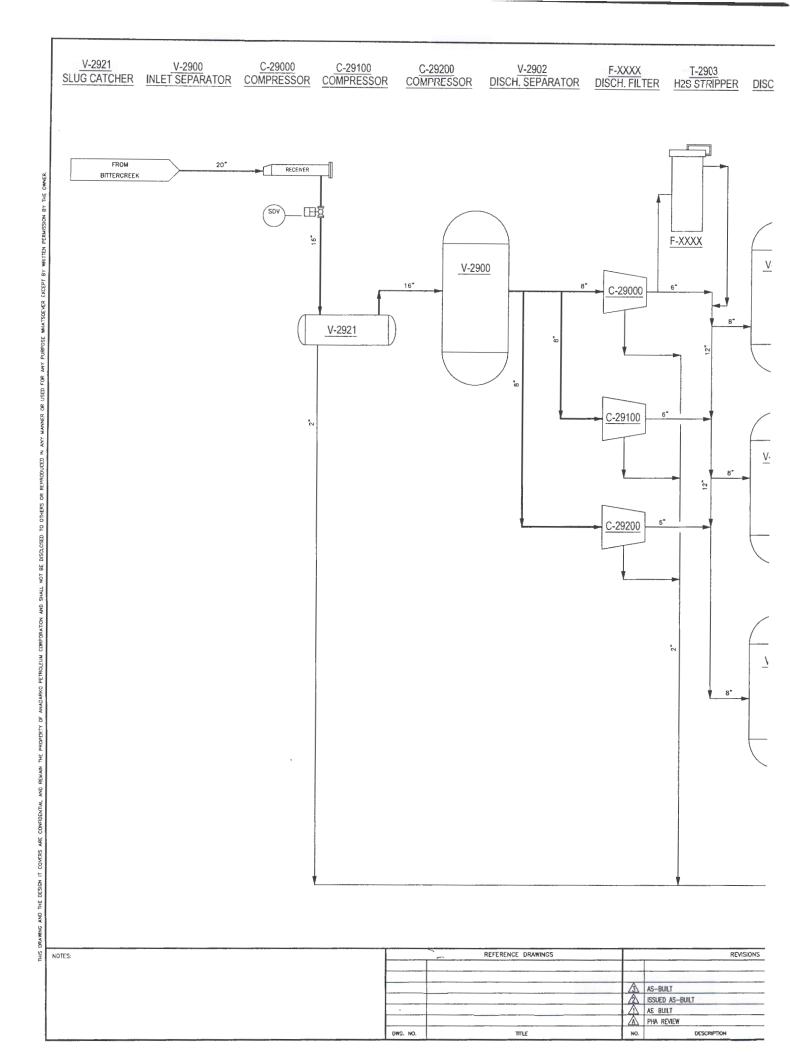
Anadarko Uintah Midstream LLC (Anadarko) owns and operates the Sage Grouse Compressor Station (Sage Grouse), within the exterior boundaries of the Uintah and Ouray Indian Reservation, in Uintah County, Utah.

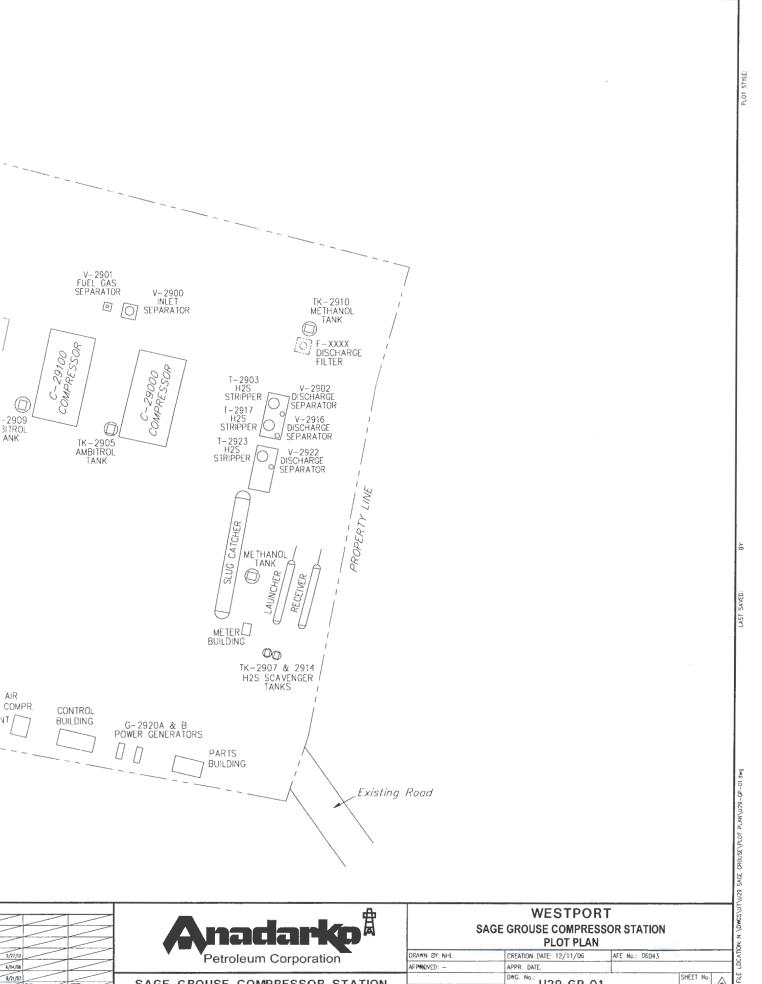
Natural gas from the surrounding field is routed to the compressor station via the gas collection system. Natural gas enters the compressor station through the inlet slug catcher where liquids are gravitationally separated from the stream. Condensate recovered is sent to the atmospheric storage tanks. Gas goes through two stages of compression before discharge from the facility. Water is stored in the atmospheric storage tanks along with condensate collected. Liquids are held in storage tanks onsite until loaded into trucks for transport to sale.

Sage Grouse operations consists of:

- Three Caterpillar G3516 compressor engines (SGG1, 2 and 3)
- Two Caterpillar G3416 generator engines (SGG GEN-1, SGG GEN-2)
- One Caterpillar G3306 generator engine (SGG GEN-3)
- Three H2S Strippers (T-2903, T-2917, and T-2923)
- Three produced water tanks (Tank-81802, 81803, and 81804)
- One truck loading area
- One 0.25 MMBtu/hr line heater (H-2912)
- Piping components (FUG)







Petroleum Corporation

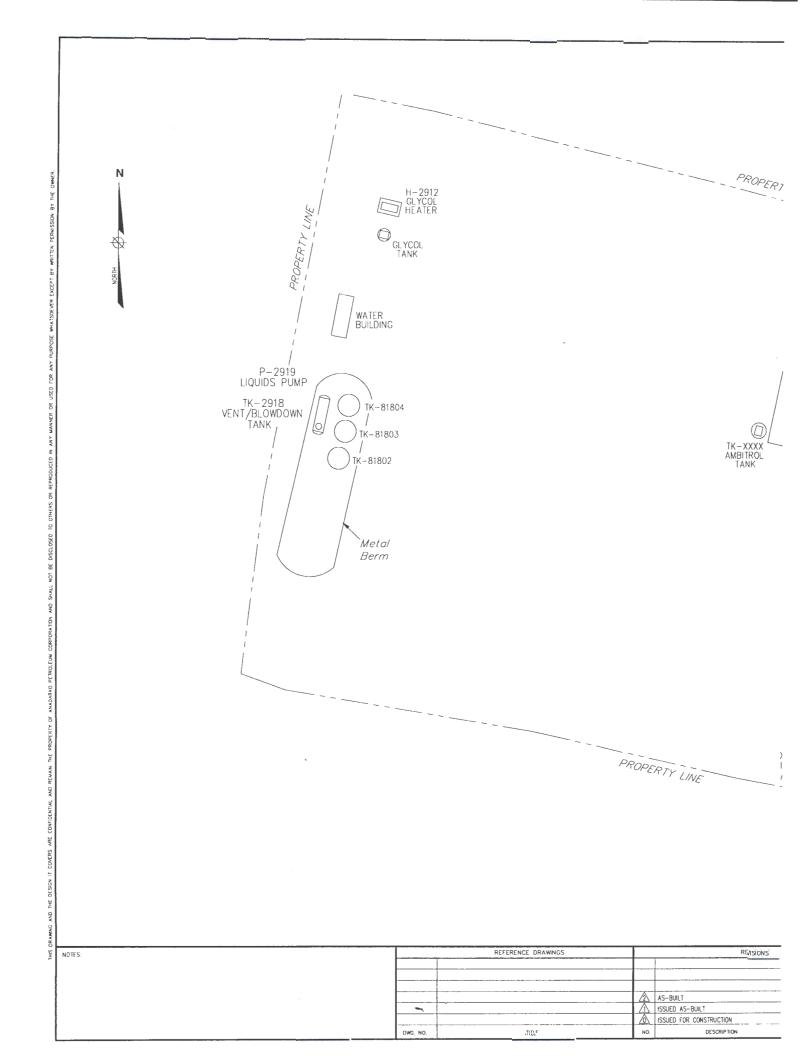
DRAWN BY: NHL CREATION DATE: 12/11/06 AFE No.: 06043

AFPREVED: APPR. DATE: DWG. No.: SHEET No U29-GP-01 SCALE: NONE

SAGE GROUSE COMPRESSOR STATION

6/04/08

8/21/07



Appendix D

Emission Unit Description

CO Emissions:

As per the Kerr-McGee ("KMG") Consent Decree, KMG is requesting to make the emission limits outlined in paragraphs 41 and 50 federal enforceable as required by paragraph 167. All engines located at the Sage Grouse Compressor Station are fitted with oxidation catalyst which demonstrate a control efficiency of 93% is required for these RICEs as per the Kerr-McGee Consent Decree (paragraphs 41 and 50).

KMG is requesting the control requirements for CO in the Consent Decrees be incorporated as permit conditions.

Proposed limits

CO emission control efficiency of 93% for Engines SGG 1, SGG 2, SGG 3, SGG Gen 1, SGG Gen 2, and SGG Gen 3

Proposed testing

- Initial Testing
 - Swap-outs and Like-kind Replacement Engines
 - Initial compliance test shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup.

• Test Methods:

- Measure the O₂ and CO at the outlet of the control device using portable analyzer. Use ASTM D6522-00 (2005), Method 10 of 40 CFR appendix A, or some other EPA approved Method for CO.
 Measurements to determine O₂ must be made at the same time as the measurements for CO concentration.
- Convert to g/hp-hr using Method 19 and the manufacturer's specific fuel consumption or measured fuel consumption and horsepower at the time of the testing.
- Conduct one (1) test run for each performance test required. Each test run must last at least 21 minutes

Ongoing Testing

• Semi-annual or annual testing must be completed to verify compliance with g/hp-hr limits. Existing engines currently follow a semi-annual testing schedule. After permit issuance, if there is documented history of two consecutive, passing compliance tests, the testing frequency shall be reduced to annually. Overall, the testing frequency will not be reduced to annual tests until there are two consecutive, passing compliance tests (taking into account pre-permit, compliant tests). Total facility CO emissions shall be calculated based on the results of the latest test and 8,760 hours per year of operation. Should there

be a failed test, testing will resort to semi-annual testing. Two compliant semi-annual tests will be required before reverting to annual testing. Semi-annual tests must be completed within 180 days of permit issuance and annual tests must be completed within 365 days of permit issuance. Subsequent semi-annual and annual tests must occur anytime within the January to June and July to December semi-annual period or calendar year period, for semi-annual and annual testing, respectively. This means there will be instances where the time in between semi-annual tests may exceed 180 days and the time in between annual tests may exceed 365 days.

Test Methods:

- Measure the O₂ and CO at the outlet of the control device using portable analyzer. Use ASTM D6522-00 (2005), Method 10 of 40 CFR appendix A, or some other EPA approved Method for CO.
 Measurements to determine O₂ must be made at the same time as the measurements for CO concentration.
- Convert to g/hp-hr using Method 19 and the manufacturer's specific fuel consumption or measured fuel consumption and horsepower at the time of the testing.
- Conduct one (1) test run for each performance test required. Each test run must last at least 21 minutes

• Reporting Requirements

- Notification of performance test shall be submitted 30 days prior to the date of the performance test.
- Test reports shall be submitted within 60 days of completion of any compliance test.

Operation and Maintenance Requirements

 At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

Formaldehyde Emissions:

 This facility is a not major source of HAPs and is therefore not subject to the major source requirements of NESHAP Subpart ZZZZ. Therefore, no limits are being requested.

NOx Emissions:

• This facility NOx emissions are below the PSD threshold and, therefore, no limits are being requested.

VOC Emissions:

- Engines
 - VOC emissions based off manufacture's information. Total facility emissions are below the PSD threshold and, therefore, no limits are being requested.
- Produced Water Tanks
 - The produced water tanks at this station collect minimal condensate volumes. The VOC emissions from each tank are estimated based on process model to less than 6tpy.
 - Recordkeeping
 - Shall maintain records and information adequate to demonstrate its compliance with the requirements of this permit for five years.
- Pneumatic Controllers
 - o Permit Limit:
 - All pneumatic controllers shall be "low bleed" controllers.

Appendix E

Emission Summary

Facility: Sage Grouse Compressor Station

Location: Section 32 T10S R22E

	Uncontrolled Emissions (TPY)										
Unit ID	Description	NOx	CO	VOC	PM10	CO2e	CH2O	Acetaldehyde	Benzene	Acrolein	HAPS TOT
SGG 1	G3516TALE	19.4	110.0	4.3	0.0	5784.1	3.8	0.36	0.02	0.22	4.36
SGG 2	G3516TALE	19.4	110.0	4.3	0.0	5784.1	3.8	0.36	0.02	0.22	4.36
SGG 3	G3516TALE	19.4	110.0	4.3	0.0	5784.1	3.8	0.36	0.02	0.22	4.36
SGG Gen1	G3412LE	12.3	12.1	2.0	0.0	2886.1	1.8	0.18	0.01	0.11	2.09
SGG Gen2	G3412LE	12.3	12.1	2.0	0.0	2886.1	1.8	0.18	0.01	0.11	2.09
SGG Gen3	G3306 TALE	1.4	0.1	0.0	0.0	32.3	0.02	0.00	0.00	0.00	0.02
TK 1-3	Tank Emissions	-	-	5.0	-	52.8	-	-	0.07	-	0.74
L-1	Tank Truck Loading	-	-	Insig.	-		_	-		_	-
HTR 1	Line Heater	0.2	0.1	Insig.	-	160.1	-	-	-	-	-
FUG	Fugitives	-		5.2	-		-	-			-
	Total	84.4	354.4	26.9	0.0	23369.6	14.8	1.5	0.1	0.9	18.0

	PTE Emissions (TPY)										
Unit ID	Description	NOx	CO	VOC	PM10	CO2e	CH2O	Acetaldehyde	Benzene	Acrolein	HAPS TOT
SGG 1	G3516TALE	19.4	7.7	3.2	0.0	5784.1	0.9	0.36	0.02	0.22	1.51
SGG 2	G3516TALE	19.4	7.7	3.2	0.0	5784.1	0.9	0.36	0.02	0.22	1.51
SGG 3	G3516TALE	19.4	7.7	3.2	0.0	5784.1	0.9	0.36	0.02	0.22	1.51
SGG Gen1	G3412LE	12.3	0.8	1.5	0.0	2886.1	0.4	0.18	0.01	0.11	0.73
SGG Gen2	G3412LE	12.3	0.8	1.5	0.0	2886.1	0.4	0.18	0.01	0.11	0.73
SGG Gen3	G3306 TALE	1.4	0.0	0.0	0.0	32.3	0.00	0.00	0.00	0.00	0.01
TK 1-3	Tank Emissions	-	-	5.0	-	52.8	-	-	0.07	-	0.74
L-1	Tank Truck Loading	1	-	Insig.	-	-	-	-	-	-	-
HTR 1	Line Heater	0.2	0.1	Insig.		0.0	-	-	1	-	-
FUG	Fugitives	-	-	5.2	-	-	-	-	-	-	-
	Total	84.4	24.9	22.8	0.0	23209.5	3.6	1.5	0.1	0.9	6.7

Per guidance, PTE accounts for legally and practically enforceable restrictions (emission controls).

Appendix F

Detailed Emission Calculation

Sage Grouse Compressor Station Engine Detail Sheet

Source 1D Number	SGG 1		
Source Description	4-Cyclc Lean Burn		
Engine Usage	Compressor Engine		
Engine Make	Caterpillar	Potential operation	8760 hr/yr
Engine Model	G3516TALE		
Serial Number	4EK04758	Manufacture Date	9/27/2005
Date in Service	3/13/2006	Potential fuel usage	96.2 MMscf/yr
Emission Controls	Lean Burn		10979 scf/hr
	Oxidation Catalyst/AFR		
		Stack 1D	SGG 1
Engine Rating	1340 BHP	Stack Height	ft
Fuel Heating Value	905.0 Btu/scf	Stack Diameter	1.0 ft
Heat Rate	9.94 MMBtu/hr	Exit Velocity	78.4 ft/s
Engine Heat Rate	7415 Btu/hp-hr	Exit Temperature	840 deg F

Uncontrolled Emissions

Pollutant	Emission Factor		Estimated	Emissions	Source of Emission	
	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)	Factor	
NOx	0.45	1.50	4.43	19.4	Manuf. Data	_
CO	2.53	8.50	25.11	110.0	Manuf. Data	
VOC	0.10	0.33	0.97	4.3	Manuf. Data	
SOx	5.88E-04	0.002	0.01	0.03	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
CO2e	132.9	447.0210	1320.56	5784.07	GHG Subpart C Calc.	
HAPs					•	lb/yr
НСНО	0.09	0.29	0.86	3.75	Manuf. Data	7504.
Benzene	4.40E-04	0.0015	0.004	0.02	AP-42, Table 3.2-2	38
Acrolein	5.14E-03	0.0173	0.051	0.22	AP-42, Table 3.2-2	447.
Acetaldehyde	8.36E-03	0.0281	0.083	0.36	AP-42, Table 3.2-2	727.
				4.36		

Volume Flow Rate

3,690 ft³/min

Pollutant	Emission Factor		Estimated	Emissions	Source of Emission	
	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)	Factor	
NOx	0.45	1.50	4.43	19.4	Manuf. Data	
CO*	0.18	0.60	1.76	7.7	Manuf. Control Data	
VOC*	0.07	0.25	0.73	3.2	Manuf. Data	
SOx	5.88E-04	0.002	0.01	0.03	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
HAPs						
HCHO*	0.02	0.07	0.21	0.90	Manuf. Control Data	1801
Benzene	4.40E-04	0.0015	0.004	0.02	AP-42, Table 3.2-2	38
Acrolein	5.14E-03	0.0173	0.051	0.22	AP-42, Table 3.2-2	447
Acetaldehyde	8.36E-03	0.0281	0.083	0.36	AP-42, Table 3.2-2	727

^{*}CO: 93% Control Efficiency; VOC: 25% Control Efficiency; Formaldehyde: 76% Control Efficiency

Sage Grouse Compressor Station Engine Detail Sheet

Source ID Number Source Description	SGG 2 4-Cycle Lean Burn		
Engine Usage	Compressor Engine		
Engine Make	Caterpillar	Potential operation	8760 hr/yr
Engine Model	G3516TALE		
Serial Number	4EK05096	Manufacture Date	4/7/2006
Date in Service	9/10/2006	Potential fuel usage	96.2 MMscf/yr
Emission Controls	Lean Burn		10979 scf/hr
	Oxidation Catalyst/AFR		
		Stack ID	SGG 2
Engine Rating	1340 BHP	Stack Height	ft
Fuel Heating Value	905.0 Btu/scf	Stack Diameter	1.0 ft
Heat Rate	9.94 MMBtu/hr	Exit Velocity	78.4 ft/s
Engine Heat Ratc	7415 Btu/hp-hr	Exit Temperature	840 deg F

Uncontrolled Emissions

Pollutant	Emission Factor		Estimated Emissions		Source of Emission	
	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)	Factor	1
NOx	0.45	1.50	4.43	19.4	Manuf, Data	
CO	2.53	8.50	25.11	110.0	Manuf. Data	
VOC	0.10	0.33	0.97	4.3	Manuf. Data	
SOx	5.88E-04	0.002	0.01	0.03	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
CO2e	132.9	447.0	1320.6	5784.1	GHG Subpart C Calc.	
HAPs					•	lb/yr
НСНО	0.09	0.29	0.86	3.75	Manuf. Data	7504.8
Benzene	4.40E-04	0.0015	0.004	0.02	AP-42, Table 3.2-2	38.3
Acrolein	5.14E-03	0.0173	0.051	0.22	AP-42, Table 3.2-2	447.4
Acetaldehyde	8.36E-03	0.0281	0.083	0.36	AP-42, Table 3.2-2	727.7
•				4.36		

Volume Flow Rate

3,690 ft³/min

Pollutant	Emission Factor		Estimated Emissions		Source of Emission	
	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)	Factor	
NOx	0.45	1.50	4.43	19.4	Manuf. Data	•
CO*	0.18	0.60	1.76	7.7	Manuf. Control Data	
VOC*	0.07	0.25	0.73	3.2	Manuf. Data	
SOx	5.88E-04	0.002	0.01	0.03	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
HAPs						
HCHO*	0.02	0.07	0.21	0.90	Manuf. Control Data	1801.
Benzene	4.40E-04	0.0015	0.004	0.02	AP-42, Table 3.2-2	38.
Acrolein	5.14E-03	0.0173	0.051	0.22	AP-42, Table 3.2-2	447.
Acetaldehyde	8.36E-03	0.0281	0.083	0.36	AP-42, Table 3.2-2	727.

^{*}CO: 93% Control Efficiency; VOC: 25% Control Efficiency; Formaldehyde: 76% Control Efficiency

Sage Grouse Compressor Station **Engine Detail Sheet**



Source 1D Number	SGG 3
Source Description	4-Cycle

le Lean Burn Engine Usage Compressor Engine

Engine Make Caterpillar Potential operation 8760 hr/yr

Engine Model G3516TALE

Serial Number WPW00300 Manufacture Date 7/13/2006

Date in Service 1/24/2008 Potential fuel usage 96.2 MMscf/yr 10979 scf/hr

Emission Controls Lean Burn

Oxidation Catalyst/AFR

Stack ID SGG3

1340 BHP Engine Rating Stack Height ft Fuel Heating Value 905.0 Btu/scf Stack Diameter 1.0 ft 9.94 MMBtu/hr Exit Velocity 78.4 ft/s Heat Rate Engine Heat Rate 7415 Btu/hp-hr Exit Temperature 840 deg F Volume Flow Rate 3,690 ft³/min

Uncontrolled Emissions

Pollutant	Emission Factor		Estimated Emissions		Source of Emission	
	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)	Factor	
NOx	0.45	1.50	4.43	19.4	Manuf. Data	
CO	2.53	8.50	25.11	110.0	Manuf. Data	
VOC	0.10	0.33	0.97	4.3	Manuf. Data	
SOx	5.88E-04	0.002	0.01	0.03	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
CO2e	132.9	447.0	1320.6	5784.1	GHG Subpart C Calc.	
HAPs					•	Ib/yr
НСНО	0.09	0.29	0.86	3.75	Manuf. Data	7504.8
Benzene	4.40E-04	0.0015	0.004	0.02	AP-42, Table 3.2-2	38.3
Acrolein	5.14E-03	0.0173	0.051	0.22	AP-42, Table 3.2-2	447.4
Acetaldehyde	8.36E-03	0.0281	0.083	0.36	AP-42, Table 3.2-2	727.7
				4.36	•	

Pollutant	Emission Factor		Estimated Emissions		Source of Emission	
	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)	Factor	
NOx	0.45	1.50	4.43	19.4	Manuf. Data	•
CO*	0.18	0.60	1.76	7.7	Manuf. Control Data	
VOC*	0.07	0.25	0.73	3.2	Manuf. Data	
SOx	5.88E-04	0.002	0.01	0.03	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
HAPs						
HCHO*	0.02	0.07	0.21	0.90	Manuf. Control Data	18
Benzene	4.40E-04	0.0015	0.004	0.02	AP-42, Table 3.2-2	
Acrolein	5.14E-03	0.0173	0.051	0.22	AP-42, Table 3.2-2	4
Acetaldehyde	8.36E-03	0.0281	0.083	0.36	AP-42, Table 3.2-2	7

^{*}CO: 93% Control Efficiency; VOC: 25% Control Efficiency; Formaldehyde: 76% Control Efficiency

Sage Grouse Compressor Station

Engine Detail Sheet

SGG GEN-1		
4-Cycle Lean Burn		
Compressor Engine		
Caterpillar	Potential operation	8760 hr/yr
G3412LE		
CTP02652	Manufacture Date	9/7/2006
6/22/2009	Potential fuel usage	48.0 MMscf/yr
Lean Burn		5478 scf/hr
Oxidation Catalyst/AFR		
	Stack 1D	SGG GEN-1
637 BHP	Stack Height	ft
905.0 Btu/scf	Stack Diameter	1.6 ft
4.96 MMBtu/hr	Exit Velocity	29.1 ft/s
7783 Btu/hp-hr	Exit Temperature	788 deg F
	Volume Flow Rate	3,430 ft ³ /min
	4-Cycle Lean Burn Compressor Engine Caterpillar G3412LE CTP02652 6/22/2009 Lean Burn Oxidation Catalyst/AFR 637 BHP 905.0 Btu/scf 4.96 MMBtu/hr	4-Cycle Lean Burn Compressor Engine Caterpillar Potential operation G3412LE CTP02652 Manufacture Date 6/22/2009 Potential fuel usage Lean Burn Oxidation Catalyst/AFR Stack ID 637 BHP Stack Height 905.0 Btu/scf Stack Diameter 4.96 MMBtu/hr Exit Velocity 7783 Btu/hp-hr Exit Temperature

Uncontrolled Emissions

Pollutant	Emission	ı Factor	Estimated	Emissions	Source of Emission Factor	
	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)		
NOx	0.57	2.00	2.81	12.3	Manuf. Data	
CO	0.56	1.97	2.77	12.1	Manuf. Data	
VOC	0.09	0.32	0.45	2.0	Manuf. Data	
SOx	5.88E-04	0.002	0.00	0.0	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.0	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.0	AP-42, Table 3.2-2	
CO2e	132.9	469.2063	658.92	2886.05	GHG Subpart C Calc.	
HAPs						
НСНО	8.21E-02	0.29	0.41	1.78	Manuf. Data	3567.6
Benzene	4.40E-04	0.0016	0.002	0.01	AP-42, Table 3.2-2	19.1
Acrolein	5.14E-03	0.0181	0.025	0.11	AP-42, Table 3.2-2	223.2
Acetaldehyde	8.36E-03	0.0295	0.041	0.18	AP-42, Table 3.2-2	363.1
•				2.09		

PTE Emissions

Pollutant	Emission Factor		Estimated Emissions		Source of Emission Factor	
	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)		
NOx	0.566522543	2.00	2.81	12.3	Manuf. Data	
CO*	0.04	0.14	0.19	0.8	Manuf. Control Data	
VOC*	0.07	0.24	0.34	1.5	Manuf. Data	
SOx	5.88E-04	0.002	0.00	0.01	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
HAPs					#REF!	
HCHO*	0.02	0.07	0.10	0.43	Manuf. Control Data	85
Benzene	0.00	0.00	0.002	0.01	AP-42, Table 3.2-2	1
Acrolein	5.14E-03	0.0181	0.025	0.11	AP-42, Table 3.2-2	22
Acetaldehyde	8.36E-03	0.0295	0.041	0.18	AP-42, Table 3.2-2	36
•					0.73	

*CO: 93% Control Efficiency; VOC: 25% Control Efficency; Formaldehyde: 76% Control Efficiency

Sage Grouse Compressor Station Engine Detail Sheet

Source ID Number	SGG GEN-2		
Source Description	4-Cycle Lean Burn		
Engine Usage	Compressor Engine		
Engine Make	Caterpillar	Potential operation	8760 hr/yr
Engine Model	G3412LE		
Serial Number	CTP02708	Manufacture Date	3/6/2007
Date in Service	10/5/2010	Potential fuel usage	48.0 MMscf/yr
Emission Controls	Lean Burn		5478 scf/hr
	Oxidation Catalyst/AFR		
		Stack ID	SGG GEN-2
Engine Rating	637 BHP	Stack Height	ft
Fuel Heating Value	905.0 Btu/scf	Stack Diameter	1.6 ft
Heat Rate	4.96 MMBtu/hr	Exit Velocity	29.1 ft/s
Engine Heat Rate	7783 Btu/hp-hr	Exit Temperature	788 deg F
		Volume Flow Rate	3,430 ft ³ /min

Uncontrolled Emissions

Pollutant	Emission Factor		Estimated Emissions		Source of Emission Factor	
	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)		
NOx	0.57	2.00	2.81	12.3	Manuf. Data	
CO	0.56	1.97	2.77	12.1	Manuf. Data	
VOC	0.09	0.32	0.45	2.0	Manuf. Data	
SOx	5.88E-04	0.002	0.00	0.0	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.0	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.0	AP-42, Table 3.2-2	
CO2e	132.9	469.2063	658.92	2886.05	GHG Subpart C Calc.	
HAPs						
НСНО	8.21E-02	0.29	0.41	1.78	Manuf. Data	3567.
Benzene	4.40E-04	0.0016	0.002	0.01	AP-42, Table 3.2-2	19.
Acrolein	5.14E-03	0.0181	0.025	0.11	AP-42, Table 3.2-2	223.
Acetaldehyde	8.36E-03	0.0295	0.041	0.18	AP-42, Table 3.2-2	363.
				2.09		

PTE Emissions

Pollutant	Emission Factor		Estimated Emissions		Source of Emission Factor	
	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)		
NOx	0.566522543	2.00	2.81	12.3	Manuf. Data	
CO*	0.04	0.14	0.19	0.8	Manuf. Control Data	
VOC*	0.07	0.24	0.34	1.5	Manuf. Data	
SOx	5.88E-04	0.002	0.00	0.01	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
HAPs					#REF!	
HCHO*	0.02	0.07	0.10	0.43	Manuf. Control Data	856
Benzene	0.00	0.00	0.002	0.01	AP-42, Table 3.2-2	19
Acrolein	5.14E-03	0.0181	0.025	0.11	AP-42, Table 3.2-2	223
Acetaldehyde	8.36E-03	0.0295	0.041	0.18	AP-42, Table 3.2-2	363
,					0.73	

*CO: 93% Control Efficiency; VOC: 25% Control Efficency; Formaldehyde: 76% Control Efficiency

Sage Grouse Compressor Station Engine Detail Sheet

Source ID Number	SGG GEN-3		
Source Description	4-Cycle Lean Burn		
Engine Usage	Compressor Engine		
Engine Make	Caterpillar	Potential operation	500 hr/yr
Engine Model	G3306 TALE		
Serial Number	HCC00520	Manufacture Date	10/30/2012
Date in Service	3/19/2013	Potential fuel usage	0.5 MMscf/yr
Emission Controls	Lean Burn		61 scf/hr
	Oxidation Catalyst/AFR		
		Stack ID	SGG GEN-3
Engine Rating	125 BHP	Stack Height	ft
Fuel Heating Value	905.0 Btu/scf	Stack Diameter	1.6 ft
Heat Rate	0.97 MMBtu/hr	Exit Velocity	29.1 ft/s
Engine Heat Rate	7783 Btu/hp-hr	Exit Temperature	788 deg F
		Volume Flow Rate	3,430 ft ³ /min

Uncontrolled Emissions

Pollutant	Emission Factor		Estimated	Emissions	Source of Emission Factor	
i .	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)		
NOx	5.75	20.30	5.59	1.4	Manuf. Data	
CO	0.42	1.50	0.41	0.1	Manuf. Data	
VOC	0.07	0.24	0.07	0.0	Manuf. Data	
SOx	5.88E-04	0.002	0.00	0.0	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.0	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.0	AP-42, Table 3.2-2	
CO2e	132.9	26.7812	7.38	32.33	GHG Subpart C Calc.	
HAPs						
НСНО	8.21E-02	0.29	0.08	0.02	Manuf. Data	700.1
Benzene	4.40E-04	0.0016	0.000	0.00	AP-42, Table 3.2-2	3.7
Acrolein	5.14E-03	0.0181	0.005	0.00	AP-42, Table 3.2-2	43.8
Acetaldehyde	8.36E-03	0.0295	0.008	0.00	AP-42, Table 3.2-2	71.2
•				0.02		

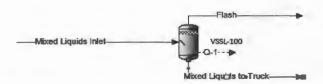
Pollutant	Emission Factor		Estimated	Emissions	Source of Emission Factor	
	(lb/MMBtu)	(g/hp-hr)	(lb/hr)	(tpy)		
NOx	5.750203811	20.30	5.59	1.4	Manuf. Data	
CO*	0.03	0.11	0.03	0.0	Manuf. Control Data	
VOC*	0.05	0.18	0.05	0.0	Manuf. Data	
SOx	5.88E-04	0.002	0.00	0.00	AP-42, Table 3.2-2	
PM10	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
PM2.5	7.71E-05	0.0003	0.00	0.00	AP-42, Table 3.2-2	
HAPs					#REF!	
HCHO*	0.02	0.07	0.02	0.00	Manuf. Control Data	168
Benzene	4.40E-04	0.00	0.000	0.00	AP-42, Table 3.2-2	3
Acrolein	5.14E-03	0.0181	0.005	0.00	AP-42, Table 3.2-2	43
Acetaldehyde	8.36E-03	0.0295	0.008	0.00	AP-42, Table 3.2-2	71
•					0.01	

^{*}CO: 93% Control Efficiency; VOC: 25% Control Efficency; Formaldehyde: 76% Control Efficiency

Names	Units	Flash
Carbon Dioxide(Mass Flow)	ton/yr	0.34
Methane(Mass Flow)	ton/yr	2.5
Benzene(Mass Flow)	ton/yr	0.073
Toluene(Mass Flow)	ton/yr	0.055
Ethylbenzene(Mass Flow)	ton/yr	0.0023
p-Xylene(Mass Flow)	ton/yr	0.0099
n-Hexane(Mass Flow)	ton/yr	0.6

Annual tank loss calculations for "Mixed Liquids Inlet".
Flashing losses are 5.011 tonlyr.
* Only Non-Exempt VOC are reported.

Tank-



Names	Units	Mitted Liquids Inlet	Fitash	Mitted Eliquids to Truck
Carbon Dloxide(Mole Fraction)	%	0.0073	2.7	0.0015
Nitrogen(Mote Fraction)	%	7.7e-05	0.036	6e-07
Methane(Mole Fraction)	%	0.12	54	0.0024
Elhane(Mole Fraction)	%	0.025	11	0.0021
Proparte(Mole Fraction)	%	0.028	10	0.0064
I-Butane(Mote Fraction)	%	0.013	3.5	0.0058
n-Bulane(Mole Fraction)	%	0.025	5.7	0.014
I-Pentane(Mole Fraction)	%	0.024	2.8	0.018
n-Pentane (Mole Fraction)	%	0.028	2.5	0.022
Heptane(Mole Fraction)	%	0.1	0.9	0.1
n-Octane(Mole Fraction)	%	0.083	0.21	0.083
Nonane(Mote Fraction)	%	0.013	0.0094	0.013
C10+(Mole Fraction)	%			
Benzene (Mole Fraction)	%	0.014	0.33	0.013
Toluene(Mole Fraction)	%	0.028	0.21	0.028
Ethylberzene(Mole Fraction)	%	0.0033	0.0075	0.0033
p-Xylene(Mote Fraction)	%	0.014	0.033	0.014
n-Heane(Mole Fraction)	%	0.088	2.4	0.063
Liquid Volumetric Flow	DEAGG	52.373	131.03	39.29

Annual tank loss calculations for "Mixed Liquids Inlet". Total working and breathing losses from the Vertical Cylinder are 0.0104 tonlyr.	1
Loading losses are 0.005639 ton/yr of loaded liquid.	,
* Only Non-Exempt VOC are reported.	

Sage Grouse Compressor Station Annual Condensate Throughput

		Condensate	Average	Water	Average	Combined	Average
		Production	Production	Production	Production	Production	Production
'ear	Month	bbls/month	bbls/day	bbls/month	bbls/day	bbls/month	bbls/day
	Jan	230	7	790	25	1020	34.0
	Feb	160	6	630	20	790	26.3
	Mar	300	10	635	20	935	31.2
	Apr	0	0	0	0	0	0.0
	May	0	0	240	8	240	8.0
2014	Jun	40	1	40	1	80	2.7
2014	Jul	0	0	50	2	50	1.7
	Aug	0	0	0	0	0	0.0
	Sep	0	0	0	0	0	0.0
	Oct	0	0	0	0	0	0.0
	Nov	0	0	160	5	160	5.3
	Dec	0	0	0	0	0	0.0
	Jan	240	8	0	0	240	8.0
	Feb	0	0	0	0	0	0.0
	Mar	0	0	0	0	0	0.0
	Apr	0	0	0	0	0	0.0
	May	0	0	80	3	80	2.7
2015	Jun	0	0	320	10	320	10.7
2015	Jul	0	0	400	13	400	13.3
	Aug	0	0	400	13	400	13.3
	Sep	0	0	320	10	320	10.7
	Oct	0	0	240	8	240	8.0
	Nov	0	0	330	11	330	11.0
	Dec	0	0	1180	38	1180	39.3
	Average D	aily Production	1		3		4

Max 2015 Avg Daily Production

39.3

Sage Grouse Compressor Station Heater Emission Calculation Sheet

Insignificant Source

Heater Data		
ID	HTR 1	
Description	Line Heater	
Nameplate Rating:	0.25	(MMBtu/hr)
Efficiency:	0.80	(decimal)
Heat Input:	0.31	(MMBtu/hr)
Operation:	8760	(hr/yr)
Fuel Heat Value:	1200.0	(Btu/scf)
VOC Wt Fraction:	0.07	(decimal, VOC weight fraction of the fuel gas)

Emission Factors					
	NO_X	CO	TOC	CH ₂ O	
lb/MMscf	100	84	11	0.075	
Adjusted lb/MMscf *	117.6	87.7	12.9	0.09	
lb/MMBtu	0.115	0.086	0.013	0.000	

^{*} Emission factor conversion based on footnote "a" of AP-42 Table 1.4-1 to convert from 1,020 Btu/scf to the above Fuel Heat Value in units of Btu/scf.

NO	Χ	(O	V	OC	CF	I ₂ O
(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(tcn/yr)
0.04	0.16	0.03	0.12	0.00	0.00	0.00	0.00

onversions:			
1 Metric Ton =	2204.62	lbs	
1 kg =	0.001	metric tons	
Pollutant	kg/mmbtu	metric ton	tpy
CO ₂	53.02	145	159.99
CH ₄	0.001	0.0	0.00
N ₂ O	0.0001	0.0	0.00
		CO _{2e} =	160

Sage Grouse Compressor Station Fugitives Detail Sheet

Component Source Counts for Gas Plant/Compressor Station Units

		Component Br	THI COUNTY TO T						
Equipment Type	Compressor	Separator	Condensate Tank	TEG Unit	DEA Unit	C3 Refrig Skid	Expan Demeth	Mole Sieve System	Flare
For this facility, Number of Units	6	6	3	0	0	0	0	0	0
Valves - Inlet Gas	40	6	4	75	15	40	40	25	8
Valves - Liquid	5	4	6	20	60	35	35	0	2
Relief Valves	2	2	2	4	4	. 6	6	4	2
Pump Seals - Liquid	0	0	2	4	4	0	0	0	0
Flanges/Connectors - Inlet Gas	150	50	50	250	250	250	250	100	75
Flanges/Connectors - Liquid	10	10	10	20	20	20	20	20	10
Compressor Seals	4	0	0	0	0	6	0	0	0

	tit	

		ugitives						
Equipment Type	Emission Factor (lb/hr/source)	Source Count*	% VOC C3+	%НАР	VOC Emission Rate (lb/hr)	HAP Emission Rate (lb/hr)	HAP Emission Rate (tpy)	VOC Emission Rate (tpy)
Valves - Inlet Gas	0.00992	288	11.40%	0.12%	0.326	0.003	0.015	1.43
Valves - Liquid	0.00550	72	100.00%	11.40%	0.396	0.045	0.198	1.73
Relief Valves	0.01940	30	11.40%	0.12%	0.066	0.001	0.003	0.29
Pump Seals - Liquid	0.02866	6	100.00%	11.40%	0.172	0.020	0.086	0.75
Flanges/Connectors - Inlet Gas	0.00086	1350	11.40%	0.12%	0.132	0.001	0.006	0.58
Flanges/Connectors - Liquid	0.00024	150	100.00%	11.40%	0.036	0.004	0.018	0.16
Compressor Seals	0.01940	24	11.40%	0.12%	0.053	0.001	0.002	0.23
Total					1.181	0.075	0.33	5.17

* Source counts estimated from similar facilities. These counts are not actuals.

Source: EPA Protocol for Equipment Leak Emission Estimates, November, 1995, EPA-453/R-95-017

Appendix G

Regulatory Analysis

Regulatory Analysis

40 CFR 60 - New Source Performance Standards (NSPS)

<u>Subpart A: General Provisions.</u> This subpart applies to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication of any standard in part 60. The general provisions under subpart A apply to sources that are subject to the specific subparts of part 60. This facility is not subject to specific subparts of part 60; therefore, the General Provisions of part 60 do not apply.

Subpart Dc Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units, applies to steam generating units having a capacity between 10 MMBtu/hr and 100 MMBtu/hr that are construction, reconstructed or modified after June 9, 1989. There are no emission units that meet the definition of a steam generating unit at this facility. Therefore, the requirements of subpart Dc do not apply.

<u>Subpart Kb</u> Standards of Performance for Volatile Organic Liquid Storage Vessels, applies to each storage vessel with a capacity greater than or equal to 75 cubic meters used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. There are no storage tanks greater than 75 cubic meters that store volatile organic liquids at this facility which vent emissions to the atmosphere, therefore Subpart Kb does not apply.

<u>Subpart KKK</u> Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants apply to affected facilities in onshore natural gas processing plants that commenced construction, modification or reconstruction after January 20, 1984. A natural gas processing plant is defined in the Subpart as any site "engaged in the extraction of natural gas liquids from field gas". This facility does not contain processes which extract natural gas liquids from field gas. Therefore, this rule does apply.

<u>Subpart LLL</u> Standards of Performance for Onshore Natural Gas Processing; SO2 Emissions. This rule applies to sweetening units and sulfur recovery units at onshore natural gas processing facilities. This facility is not an onshore natural gas processing facility. Therefore, this rule does not apply.

<u>Subpart IIII</u> Standards of Performance for Stationary Compression Ignition Internal Combustion Engines applies to manufacturers, owners and operators of stationary compression ignition (CI) internal combustion engines (ICE). There are no stationary compression ignition engines at this site, therefore Subpart IIII does not apply.

<u>Subpart JJJJ</u> Standards of Performance for Stationary Spark Ignition Internal Combustion Engines applies to manufacturers, owners and operators of stationary spark ignition (SI) internal combustion engines (ICE). This applies to engines that were ordered from the manufacturer after June 12, 2006 and;

- Are greater than 500 hp and manufactured after July 1, 2007 or
- Lean burn engines greater than 500 hp but less than 1,350 hp and manufactured after January 1, 2008

Engines SGG-1, SGG-2, SGG-3, SGG Gen-1, and SGG Gen-2 are lean burn engines greater than 500 hp but less than 1,350 hp that were manufactured prior to January 1, 2008; therefore, subpart JJJJ does not apply to these engines. Engine SGG Gen-3 is a lean burn engine less than 500 hp that was manufactured after July 1, 2008; therefore, subpart JJJJ does apply to this engine.

<u>Subpart OOOO</u> Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution. This subpart establishes emissions standards and compliance schedules for the control of VOCs and SO2 emissions from affected facilities that commenced construction, modification or reconstruction after August 23, 2011. The rule applies to equipment leaks at onshore natural gas processing plants and compressors. This facility is not a natural gas processing plant and compressors were constructed prior to August 23, 2011; therefore, subpart OOOO is not applicable.

40 CFR 61 - National Emission Standards for Hazardous Air Pollutants

<u>Subpart V</u> National Emission Standard for Equipment Leaks (Fugitive Emission Sources). This subpart applies to sources that are intended to operate in volatile hazardous air pollutant (VHAP) service. Based on engineering judgment, historical and recent gas composition and facility process it can be predicted that the percent VHAP content will never exceed 10 percent by weight; therefore Subpart V is not an applicable regulation for the facility.

40 CFR 63 - National Emission Standards for Hazardous Air Pollutants (NESHAP)

<u>Subpart HH</u> National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities, applies to glycol dehydration units, storage vessels with potential for flash emissions, and ancillary equipment operating in volatile hazardous air pollutant service that is located at a natural gas processing plant which is a major source of HAPS. This facility is not a natural gas processing plant therefore Subpart HH does not apply.

<u>Subpart HHH</u> National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities. This rule applies to natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user, and that are a major source of HAP emissions. This subpart does not apply to this facility because it does not meet the definition of a Natural Gas Transmission and Storage Facility

Subpart EEEE National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline). This rule establishes national emission limitations, operating limits, and work practice standards for organic HAPs emitted from organic liquids distribution operations at major sources of HAP emissions. In this subpart, organic liquids distribution operations do not include oil and natural gas production field facilities as defined in subpart HH or natural gas transmission and storage facilities as defined in subpart HHH. This facility meets the definition an oil and natural gas production field facility as defined in §63.761 of subpart HH. Therefore, this rule does not apply.

Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) establishes national emission limitations and operating limitations for HAPs emitted from stationary reciprocating internal combustion engines, and requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. This facility is an area source of HAPs; therefore, the facility is not subject to major source ZZZZ requirements. All engines at the facility are subject to the August 20, 2010 revisions to MACT ZZZZ for existing units at areas sources of HAPs. This facility is by definition a remote source and will comply with applicable requirements of this regulation.

40 CFR 98 – Green House Gas Reporting

Subpart A, General Provisions applies to a facility that contains any source category (as defined in subparts C through JJ of this part) that is listed in this paragraph (a)(2) in any calendar year starting in 2010 and that emits 25,000 metric tons CO2e or more per year in combined emissions from stationary fuel combustion units, miscellaneous uses of carbonate, and all source categories that are listed in this regulation. The facility is subject to the reporting requirements of Subpart C and Subpart W.